

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Autoscribe Corporation,	§	
	§	
<i>Plaintiff,</i>	§	
	§	Civil Action No. 2:24-cv-325
v.	§	
	§	<u>JURY TRIAL DEMANDED</u>
Nuvei Corporation, Nuvei Technologies Corporation, and Nuvei Technologies, Inc.,	§	
	§	
<i>Defendants.</i>	§	
	§	

**DECLARATION OF VERONIQUE PIERCEY IN SUPPORT OF NUVEI
CORPORATION, NUVEI TECHNOLOGIES CORP., AND NUVEI
TECHNOLOGIES, INC.’S MOTIONS TO DISMISS FOR LACK
OF PERSONAL JURISDICTION AND IMPROPER VENUE**

1. I am a Senior Corporate Paralegal with Nuvei Technologies Corp., on secondment to Nuvei (Netherlands) B.V. and I submit this declaration in support of Nuvei Corporation, Nuvei Technologies Corp., and Nuvei Technologies, Inc.’s Motions to Dismiss for Lack of Personal Jurisdiction and Improper Venue. Unless indicated otherwise, I have personal knowledge of the facts contained in this declaration, and, if called upon to do so, I could and would testify competently to the matters set forth therein.

2. Nuvei Corporation is a corporation organized under the laws of Canada with its principal place of business at 1100 René-Lévesque Boulevard West, 9th Floor, Montreal, Quebec, Canada, H3B 4N4.

3. Nuvei Technologies Corp. is a corporation organized under the laws of Canada with its principal place of business at 1100 René-Lévesque Boulevard West, 9th Floor, Montreal, Quebec, Canada H3B 4N4.

4. Nuvei Technologies, Inc. is a corporation organized under the laws of Delaware with its principal place of business at 1375 N Scottsdale Road, Suite 400 Scottsdale, AZ 85257-3451.

5. Nuvei Corporation is a holding company that is the parent company of Nuvei Technologies Corp. Nuvei Technologies Corp. is the indirect parent of Nuvei Technologies, Inc.

6. Nuvei Corporation's main business is to own its subsidiaries. Nuvei Corporation, however, does not control or direct any of the various activities of either Nuvei Technologies Corp. or Nuvei Technologies, Inc.

7. Nuvei Technologies Corp. does not control or direct any of the various activities of Nuvei Technologies, Inc.

8. Nuvei Corporation's only place of business is in Canada. Nuvei Corporation does not have any places of business in the Eastern District of Texas or elsewhere in the United States.

9. While Nuvei Corporation is a publicly traded corporation and files appropriate filings with registering organizations, Nuvei Corporation is not an operating company, and as a result does not provide services in the United States. Nuvei Corporation does not contract with any customers in the United States, including the Eastern District of Texas.

10. Nuvei Technologies Corp.'s principal place of business is in Canada. Nuvei Technologies Corp. does not have any places of business in the Eastern District of Texas or elsewhere in the United States.

11. Nuvei Technologies Corp.'s business activities are undertaken in Canada, not the United States. While some existing legacy customers may exist from previous corporate purchases, Nuvei Technologies Corp. does not seek out or contract with any new customers in the United States, including the Eastern District of Texas.

12. Nuvei Corporation is not registered to do business in the United States, including the state of Texas. Nuvei Corporation does not have accounts or telephone listings in Texas. Nuvei Corporation has no property or facilities in Texas. Nuvei Corporation pays no taxes in Texas.

13. Nuvei Technologies Corp. is not registered to do business in the United States, including the state of Texas. Nuvei Technologies Corp. does not have accounts or telephone listings in Texas. Nuvei Technologies Corp. has no property or facilities in Texas. Nuvei Technologies Corp. pays no taxes in Texas.

14. Neither Nuvei Corporation nor Nuvei Technologies Corp. employs any personnel in Texas.

15. Nuvei Technologies, Inc. does not have any places of business in the Eastern District of Texas.

16. Nuvei Technologies, Inc. employs approximately 9 people remotely in the Eastern District of Texas. The employees are not required to live in the Eastern District of Texas, do not have their service territories limited to the Eastern District of Texas or related to their residence in the Eastern District of Texas, do not have Nuvei-provided vehicles, do not store physical Nuvei products in their homes, and do not have corporately issued phone numbers in the Eastern District of Texas.

17. Neither Nuvei Corporation nor Nuvei Technologies Corp. conduct corporate meetings in Texas. Neither Nuvei Corporation nor Nuvei Technologies Corp. maintain corporate files in Texas.

18. Nuvei Corporation, Nuvei Technologies Corp., and Nuvei Technologies, Inc. are separate entities, and corporate formalities are maintained. In that regard, Nuvei Corporation,

Nuvei Technologies Corp., and Nuvei Technologies, Inc. each maintain separate books and records, separate bank accounts, and separate assets.

19. While Nuvei Technologies, Inc. previously had a place of business at 5000 Legacy Drive, Plano, TX, Nuvei Technologies, Inc. ceased all operations at that address prior to the end of 2021 and prior to the filing of the Complaint.

20. Paragraphs 1-19 above were also true as of May 3, 2024, which I understand is the date the Complaint in this action was filed.

I declare under penalty of perjury the laws of the United States of America that the foregoing is true and correct. Executed this 15th of August, 2024, in Amsterdam, Netherlands



Veronique Piercey